

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

V.

1:19CR-00146

Choat Soviravong

Motion to Suppress

On or about October 4, 2017, raided the premises of Hi=Tech pharmaceuticals. As that computers and hard drives were seized by Goveernment agents. These included a computer with the Defendant's email communications between the Defendant, allegedly Mr. Wheat, and others. The Defendants communications were also seized pursuant to a warrant issued to YAHOO. A warrant had issued on May 17, 2013, and on October 28, 2014. The October 28, 2014 was directed specifically against the Defendant

In addition to the communications seized, it is believed that the Defendant's computer and/or hard drive(s) were seized. For the reasons previously argued by co-Defendants,(including but not limited to staleness, overbreath and vagueness,) this evidence must be suppressed as the warrants were overbroad, were seized even if they contained protected information, ,and were stale.

WHEREFORE, Defendant asks that a hearing be held and that this material be suppressed,  
as well as any other evidence seized and subject to suppression as well as any fruits thereof.

S/Robert H. Citronberg

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Robert H. Citronberg  
Attorney for Defendant  
State Bar No. 126275

Suite 4100  
303 Peachtree St.,  
Atlanta, Ga. 30308  
(404) 522-7450  
rcitronberg@gmail.com

CERTIFICATE OF SERVICE

Comes now the undersigned and states that he has served this document by electronic delivery on

Mr. Nathan Kitchens  
Assistant United States Attorney  
United States attorneys Office  
75 Spring Street, SW  
Atlanta, Ga

on July 23,2019

S/Robert H. Citronberg

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Robert H. Citronberg  
Attorney for Defendant  
State Bar No. 126275

Suite 4100  
303 Peachtree St.,  
Atlanta, Ga. 30308  
678-986-3833